

1 District Judge Barbara J. Rothstein
2
3
4
5
6
7
8

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 DEKA AHMED ABDULE and BASHIR
10 MOHAMED HASHI,
11

Plaintiffs,

v.

12 UR MENDOZA JADDOU, Director of the United
13 States Citizenship and Immigration Services;
14 THOMAS SMITHAM, Charges d'Affairs of the
United States Embassy in Rome, Italy; ANTONY J.
15 BLINKEN, United States Secretary of State, United
States Department of State; ALEJANDRO
16 MAYORKAS, Secretary of Department of
Homeland Security;

17 Defendants.

Case No. 2:21-cv-01558-BJR

STIPULATION FOR EXTENSION OF
TIME

18 Plaintiffs and Federal Defendants, by and through their counsel of record, pursuant to
19 Federal Rule of Civil Procedure 6 and Local Rules 10(g) and 16, hereby jointly stipulate and
move for an extension of 30 days for Defendants to respond to the Complaint. The Court had
previously extended the response date until September 18, 2022, and stayed initial scheduling
21 dates. The parties anticipate this being the last stipulation.
22

23 A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial
and trial dates is within the discretion of the trial judge. *See King v. State of California*,

1 784 F.2d 910, 912 (9th Cir. 1986). The underlying facts continue to evolve and there is a
2 significant likelihood that the matter could either become moot or the parties are able to resolve
3 it without the need for litigation. Therefore, the parties believe good cause exists for a brief stay
4 to save the Court and the parties from spending unnecessary time and resources on it.

5 The beneficiary at issue was interviewed on June 8, 2022, and subsequently completed the
6 required security and medical check processes. All that remains is for the International Office of
7 Migration to make travel arrangements and then the government will issue the necessary travel
8 documents to the beneficiary. At that point, the case will be moot, and the parties will file the
9 appropriate papers to dismiss the matter.

10 In light of the above, the parties jointly stipulate and request that the Court:

11 1. Extend Defendants' time to respond to Plaintiffs' Complaint to October 19, 2022.

12 Stipulated to and presented this 19th day of September, 2022.

13 MENTER IMMIGRATION LAW PLLC

NICHOLAS W. BROWN
United States Attorney

14 s/ Meena Pallipamu Menter

15 MEENA PALLIPAMU MENTER, WSBA #31870
4444 Woodland Park Ave. N., Suite 203
16 Seattle, Washington 98103
Phone: 206-419-7332
17 Fax: 206-407-2594
Email: meena@meenamenter.com

18 *Counsel for Plaintiffs*

s/ Nickolas Bohl

15 NICKOLAS BOHL WSBA #48978
Assistant United States Attorney
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-4067
Email: nickolas.bohl@usdoj.gov

19 *Counsel for Defendants*

ORDER

The parties having stipulated and agreed, it is hereby so ORDERED.

DATED this 28th day of September, 2022.

Barbara Rothstein

Barbara Jacobs Rothstein
U.S. District Court Judge